

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

DENNIS BALL-BEY,)	
)	
Plaintiff,)	
)	
v.)	4:18-cv-01364-SPM
)	
KYLE CHANDLER, <i>et al.</i> ,)	
)	
Defendants.)	

**PLAINTIFF'S MOTION TO COMPEL
AND MOTION FOR SANCTIONS**

Plaintiff Dennis Ball-Bey states as follows:

1. On October 12, 2023, this Court ordered the production of files related to the shooting of Mansur Ball-Bey. ECF No. 360.
2. Counsel for Defendant Chandler failed to timely produce any documents ordered by the Court.
3. Moreover, the documents belatedly produced are plainly not compliant with the Court's order.
4. Because of Defendant's discovery delays, Plaintiff has expended many hours attempting to get answers on the status of Defendant's production. To date, the issues identified by Plaintiff's counsel remain unanswered.
5. Plaintiff therefore requests the following:
 - a. Full production of all six paper boxes from the FIU Audit.
 - b. Full production of corrupted files produced from the FIU Audit computer records.

- c. Attorney's fees for time expended by Plaintiff's counsel in researching and drafting the instant motion and in attempting to obtain the documents ordered to be produced by the Court.

Dated: December 27, 2023

KHAZAELI WYRSCH, LLC

/s/ John M. Waldron

John M. Waldron, 70401MO
James R. Wyrsh, 53197MO
Javad M. Khazaeli, 53735MO
911 Washington Avenue, Suite 211
St. Louis, Missouri 63101
(314) 288-0777
(314) 400-7701 (Fax)
jack.waldron@kwlawstl.com
james.wyrsh@kwlawstl.com
javad.khazaeli@kwlawstl.com

THE LEGAL SOLUTIONS GROUP

Jermaine Wooten, 59338MO
10250 Halls Ferry
St. Louis, Missouri 63136
(314) 736-5770
(314) 736-5772 (Fax)
wootenjlaw1@aol.com

Attorneys for Plaintiff